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**ARIZONA CORPORATION COMMISSION**  
**UNION PACIFIC'S RESPONSES TO FIRST SET OF DATA REQUESTS**  
**DOCKET NO. RR-03639A-07-0422**  
**MALEY STREET, STEWART STREET, PATTE ROAD & COUNTRY CLUB DRIVE in**  
**Willcox, AZ (Cochise County)**  
**SEPTEMBER 14, 2007**

- CW 1.1 & Provide Average Daily Traffic Counts ("ADT") for each of the four locations.  
CW 1.3 Provide a ten year traffic projection for each area.

**Response:** *Union Pacific Railroad Company ("Union Pacific") objects to CW 1.3 on the ground that Union Pacific must rely on information provided by others to calculate traffic projections. Without waiving said objection, Union Pacific responds as follows:*

Crossing	Current ADT (August 2007)	Projected 2016 ADT
Maley Street	4737	4834
Stewart Street	601	778
Patte Road	101	131
Country Club Drive	300	389

**Source:** *Traffic counts performed by Bill Pearson with ACCEPT Consulting at 28151 S. Foxwood Way, Amado, Arizona 85645, (520) 398-2149. Traffic projection calculations were performed by Heidi Schneider, Transportation Engineer with HDR Engineering, Inc at 5210 E Williams Circle, Suite 503, Tucson, AZ 85711, (520) 584-3600.*

- CW 1.2 Please provide the current Level of Service ("LOS") at each intersection.

**Response:** *Union Pacific objects to CW 1.2 on the grounds that: a) the level of service analysis is concerned with mobility rather than safety; and b) Union Pacific must rely on information provided by others to calculate the level of service. Without waiving said objections, Union Pacific responds as follows:*

Crossing	LOS (August 2007)
Maley Street	Northbound (LOS=A), Southbound (LOS=A)
Stewart Street	Northbound (LOS=A), Southbound (LOS=A)
Patte Road	Northbound (LOS=A), Southbound (LOS=A)
Country Club Drive	Northbound (LOS=A), Southbound (LOS=A)

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**Source:** *Traffic level of service calculations were performed using Synchro and SimTraffic programs under the direction of Heidi Schneider with HDR Engineering, Inc at 5210 E Williams Circle, Suite 503, Tucson, AZ 85711, (520) 584-3600. The train delay times utilized in the analysis were provided by Tom Domres, with TKDA at 750 Shoreline Drive, Suite 100, Aurora, IL 60504, (630) 499-4110 via Union Pacific.*

CW 1.4 Provide distances in miles to the next public crossing on either side of the proposed project location. Are either of these grade separations?

**Response:** *Union Pacific objects to the last question in CW 1.4 on the ground that it is irrelevant whether either of the next public crossings is a grade separation. Without waiving said objection, Union Pacific responds as follows:*

Crossing	TO THE WEST	TO THE EAST
Maley Street	9.33 miles to Hwy 191	1 block to Stewart Street
Stewart Street	1 block to Maley Street	1.2 miles to Patte Road
Patte Road	1.2 miles to Stewart Street	2.88 miles to Country Club
Country Club Drive	2.88 miles to Patte Road	12.18 miles to I-10

*The only adjacent crossings that are grade separations are the I-10 and the Hwy 191 overpasses.*

**Source:** *HDR's use of the Union Pacific Straight-line Diagrams and [www.MapQuest.com](http://www.MapQuest.com).*

CW 1.5 How and why was grade separation not decided on at this time? Please provide any studies that were done to support these answers.

**Response:** *Union Pacific objects to CW 1.5 on the ground that whether a grade separation is needed is primarily a question of mobility and convenience for vehicular traffic on the roadway, not safety. An at-grade crossing can be safe without constructing a grade separation and eliminating the grade crossing. Whether a grade separation is needed is therefore irrelevant to Union Pacific's application to add a second mainline track at these grade crossings. Without waiving said objections, Union Pacific responds as follows:*

*The diagnostic team that evaluated the four crossings involved in this application concluded the crossings were safe without constructing grade separations. This conclusion is supported by the fact that the Federal Highway Administration authorizes the use of gates and lights at multiple-track grade crossings as proposed in this application. Union Pacific is not aware of any studies specific to the crossings involved in this application.*

CW 1.6 If this crossing was to be grade separated, provide a cost estimate of the project.

**Response:** *Union Pacific objects to CW 1.6 on the ground that whether a grade separation is needed is primarily a question of mobility and convenience for vehicular traffic on the roadway, not safety. An at-grade crossing can be safe without constructing a grade separation and eliminating the grade crossing. Whether a grade separation is needed is therefore irrelevant to Union Pacific's application to add a second mainline track at these grade crossings. Moreover, any attempt to estimate the cost to construct a grade separation would be speculative in the absence of a detailed study of the particular crossing in question. Without waiving said objections, Union Pacific responds as follows:*

*In connection with its recent application to upgrade the crossing of Union Pacific tracks at the intersection of Power and Pecos Roads, RR-03639A-07-0398, the Town of Gilbert estimated that a grade separation at that location would cost \$22 million. Depending on the particular crossing involved, a reasonable range for the costs of constructing a grade separation would be between \$20 million and \$40 million.*

CW 1.7 Please describe what the surrounding areas are zoned for near this intersection. i.e. Are there going to be new housing developments, industrial parks, etc.?

**Response:** *Union Pacific objects to the second part of CW 1.7 on the grounds that: a) it calls for speculation as to whether new housing developments, industrial parks or other developments will occur in the future; and b) Union Pacific does not have access to such information, but instead must rely on information provided by others. Without waiving said objections, Union Pacific responds as follows:*

*The zoning in the area of these crossings is shown on the Cochise County's Zoning Map. Maley Street and Stewart Street both have Incorporated City designation with GB(General Business District), Patte Road has both TR-36 and GB (Transitional-Residential and General Business), Country Club Drive has both SR-8 and GB (Single Household Residential) zoning at the crossing. No known developments are planned near these crossings.*

**Source:** *The Cochise County Planning internet site:  
<http://www.cochisecounty.com/P&Z/ZoningBaseMap.htm> . Dick Schaffer, Transportation Program Manager Cochise County Planning and Zoning, 1415 Melody Lane, Building E, Bisbee, AZ, (520) 432-9332.*

CW 1.8 Please supply the following: number of daily train movements through the crossing, speed of the trains, and the type of movements being made (i.e. thru freight or switching).

**Response:** *The movements are the same for these four crossings.*

*Train Count: 48 total average trains per day (46 freight, 2 passenger)*

*Train Speed: 79 mph passenger / 70 mph freight*

*Thru Freight/Switching Moves: All moves through these four crossings are thru freight. (According to MTO Rob Henderson there are no switching moves at these crossings.)*

**Source:** *Union Pacific's Manager of Train Operations, Rob Henderson.*

CW 1.9 Please provide the names and locations of all schools (elementary, junior high and high school) within the area of the crossing.

**Response:** *Willcox High School @ 240 N Bisbee Ave, Willcox, AZ 85643  
Willcox Middle School @ 360 N Bisbee Ave, Willcox, AZ 85643  
Bonita Elementary @ 18008 S Frt Grant Road, Willcox, AZ 85643  
Willcox Elementary @ 501 W Delos, Willcox, AZ 85643*

**Source:** *Susan Unrast, Maintenance and Transportation Clerk for Willcox Schools at 480 N. Bisbee Avenue, Willcox, Arizona 85643.*

CW 1.10 Please provide school bus route information concerning the crossing, including the number of times a day a school bus crosses this crossing.

**Response:** *The buses for all the Schools cross the Maley Street crossing a total of 12 times. Stewart Street is not used for buses. Patte Road is not used. Country Club Drive (also known as Frontage Rd) is used a total of four (4) times per day.*

**Source:** *Susan Unrast, Maintenance and Transportation Clerk for Willcox Schools at 480 N. Bisbee Avenue, Willcox, Arizona 85643.*

CW 1.11 Please provide information about any hospitals in the area and whether the crossing is used extensively by emergency service vehicles.

**Response:** *The nearest hospital is Northern Cochise Community Hospital at 901 W. Rex Allen Drive in Willcox, Arizona 85643, (520)384-3541, in the northeast part of town. It is located 1 ½ miles from the Stewart, Maley and Patte Road crossings. Maley Street is used most often to access areas south of the tracks, but most of the population is on the north side of the tracks.*

**Source:** *Jennifer Crumbliss, Senior Transportation Engineer with HDR, Engineering, Inc. at 8404 Indian Hills Drive, Omaha, NE 68114, (402) 926-7049 used the internet site [www.GoggleEarth.com](http://www.GoggleEarth.com) along with discussions with Ceil Geyer, Northern Cochise Community Hospital listed above. Juan Cruz, Roadway Designer with HDR in Tucson, physically verified hospital and school locations on June 14, 2007.*

CW 1.12 Please provide the total cost of improvements to each crossing.

**Response:**

Crossing	Signal	Crossing Surface	Total
Maley Street	\$ 333,757	\$ 54,040	\$ 387,797
Stewart Street	\$ 198,856	\$ 23,160	\$ 222,016
Patte Road	\$ 199,283	\$ 23,160	\$ 222,443
Country Club Drive	\$ 207,327	\$ 23,160	\$ 230,487

**Source:** *Union Pacific's Engineering.*


ORIGINAL AND THIRTEEN COPIES  
of the foregoing filed this 14<sup>th</sup> day of  
September, 2007, with:

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Phoenix, Arizona 85007

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